IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

DURA AUTOMOTIVE SYSTEMS, LLC,

et al. 1,

Debtors.

Chapter 7

Case No. 19-12378 (KBO)

(Jointly Administered)

RE: Docket Item 1409, 1410

CERTIFICATION OF COUNSEL

- I, Gregory F. Fischer, counsel for the Chapter 7 Trustee of the estates of the above-captioned debtors, hereby certify as follows:
- 1. On June 1, 2022, the Trustee filed the Application of Jeoffrey L. Burtch, Chapter 7 Trustee to Employ Bederson LLP as Accountant (the "<u>Application</u>")², together with a proposed form of order granting the Application. D.I. 1409. The objection deadline for the Application was June 15, 2022 at 4:00 p.m.
- 2. The United States Trustee contacted undersigned counsel regarding the Application and requested that Bederson file a supplemental declaration in support of the Application, and that the Trustee make certain revisions to the original proposed order. Following discussions, and with the filing of a Supplemental Declaration of Charles N. Persing [D.I. 1410], the United States Trustee and the Trustee have agreed upon a revised proposed form of order granting the Application (the "Revised Proposed Order"), a copy of which is attached to this Certification as Exhibit "A". A comparison of the Revised Proposed Order and the proposed order originally filed with the Application is attached hereto as Exhibit "B".

¹ The debtor entities in these chapter 11 cases, along with the last four digits of each Debtor entity's federal tax identification number, are: Dura Automotive Systems Cable Operations, LLC (7052); Dura Automotive Systems, LLC (8111); Dura Fremont L.L.C. (1252); Dura G.P. (8092); Dura Mexico Holdings, LLC (4188); Dura Operating, LLC (2304); and NAMP, LLC (3693). Dura Automotive Systems, LLC's service address is: 1780 Pond Run, Auburn Hills, Michigan 48326.

² Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Application.

- 3. With the exception of the informal response from the United States Trustee, counsel for the Trustee has received no responses or objections to the Application, either formal or informal, and no responses or objections have been filed on the dockets of these cases.
 - 4. All affected parties have reviewed and approved the Revised Proposed Order.

It is hereby respectfully requested the Revised Proposed Order be entered at the earliest convenience of the Court.

Dated: June 16, 2022 /s/ Gregory F. Fischer

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Counsel to the Chapter 7 Trustee